

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: CATHERINE WARD

§
§
§

Case: 20-34254-H1-13

Debtor

Chapter 13

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

Catherine Ward, Debtor, files this Response to the Chapter 13 Trustee's Motion to Dismiss:

1. Debtor desires to continue with the chapter 13 plan.
2. Debtor has filed an amended chapter 13 plan.
3. Debtor has filed amended schedules I and J.
4. Debtor desires a hearing on the Motion to Dismiss.

WHEREFORE, Debtor requests that this court conduct a hearing, not dismiss the chapter 13 case, and for such other and further relief to which Debtor may be justly entitled.

Dated: November 10, 2020

Respectfully submitted,

/s/Nikie Marie Lopez-Pagan

Reese W. Baker

Texas Bar No. 01587700

Sonya Kapp

TX Bar No. 11095395

Nikie Marie Lopez-Pagan

TX Bar No. 24090233

Baker & Associates

950 Echo Lane, Suite 300

Houston, Texas 77024

713-869-9200

713-869-9100 (fax)

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

A copy of the foregoing Debtor's Response to the Motion to Dismiss was delivered on or about November 10, 2020, to all parties listed below in the manner listed below:

David G. Peake
9660 Hillcroft, #430
Houston, TX 77096

CM/ECF Electronic Delivery

/s/Nikie Marie Lopez-Pagan
Nikie Marie Lopez-Pagan

VERIFICATION OF TRANSMITTAL TO U.S. TRUSTEE

The undersigned attorney, under penalty of perjury, hereby certifies that a copy of Debtor's Response to the Motion to Dismiss was delivered to the United States Trustee, 515 Rusk, Suite 3516, Houston, Texas 77002, on or about November 10, 2020, by electronic delivery by the clerk of the Bankruptcy Court.

/s/Nikie Marie Lopez-Pagan
Nikie Marie Lopez-Pagan